

James C. Tecce
QUINN EMANUEL URQUHART & SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010

Objections Due: Aug. 25, 2017 at 4:00 p.m.
Presentment Date: Aug. 28, 2017 at 10:00 a.m.
Hearing Date: None, unless objections are filed

Counsel to Adversary Proceeding Plaintiffs

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:	X	Chapter 11
	:	Case No. 05-44481 (RDD)
DPH HOLDINGS CORP., <u>et al.</u> ,	:	(Jointly Administered)
	:	
Reorganized Debtors.	:	
	:	
	X	

**NOTICE OF MOTION OF ADVERSARY PROCEEDING PLAINTIFFS,
PURSUANT TO 11 U.S.C. §§ 105(a), 350(b), AND 1142(b) AND FED. R. BANKR. P. 3021
AND 5010, FOR ENTRY OF AN ORDER (A) REOPENING DPH HOLDINGS CORP.
ET AL. CHAPTER 11 CASES FOR SOLE ADMINISTRATIVE PURPOSE OF
CONSIDERING MOTION, (B) WAIVING FEES TO REOPEN CASES, AND
(C) AIDING IMPLEMENTATION OF PLAN AND ADVERSARY PROCEEDING
SETTLEMENT BY CLARIFYING THAT CLAIMS RECORD DATE SET UNDER
PLAN DOES NOT APPLY TO DISTRIBUTIONS TO BENEFICIAL
HOLDERS OF DELPHI SENIOR UNSECURED NOTES**

PLEASE TAKE NOTICE THAT the Adversary Proceeding Plaintiffs, by their attorneys Quinn, Emanuel, Urquhart & Sullivan LLP, hereby file the Motion, Pursuant To 11 U.S.C. §§ 105(a), 350(b), And 1142(b) And Fed. R. Bankr. P. 3021 And 5010, For Entry of An Order (A) Reopening DPH Holdings Corp. et al. Chapter 11 Cases For Sole Administrative Purpose of Considering Motion, (B) Waiving Fees To Reopen Cases, And (C) Aiding Implementation Of Plan And Adversary Proceeding Settlement By Clarifying That Claims Record Date Set Under Plan Does Not Apply To Distributions To Beneficial Holders Of Delphi Senior Unsecured Notes (the "**Motion**").

PLEASE TAKE FURTHER NOTICE THAT the Adversary Proceeding Plaintiffs will present the Motion for approval to the Honorable Robert D. Drain, United States Bankruptcy Judge with the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy**"),

Court”), 300 Quarropas Street, White Plains, New York 10601, on **August 28, 2017 at 10:00 a.m. (Prevailing Eastern Time)** or such other time as the Court may determine.

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the Motion (the **“Objections”**) must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, must set forth the name of the objecting party, the basis for the objection, and the specific grounds therefore and must be filed with the Bankruptcy Court electronically in accordance with General Order M-242—General Order M-242 and the User’s Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court—by registered users of the Bankruptcy Court’s case filing system, and by all other entities on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy hand delivered directly to the Chambers of the Honorable Robert D. Drain, in accordance with General Order M-242); and, any Objection must further be served upon counsel to the Adversary Proceeding Plaintiffs, Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010, Attn: James C. Tecce, Esq., so as to be filed and received by no later than **August 25, 2017 at 4:00 p.m. (Prevailing Eastern Time)** (the **“Objection Deadline”**).

PLEASE TAKE FURTHER NOTICE THAT unless a written Objection to the Motion, with proof of service, is filed with the Bankruptcy Court and a courtesy copy delivered to the Honorable Robert D. Drain’s Chambers by the Objection Deadline, then (a) no hearing will be held with respect to the Motion; (b) the Adversary Proceeding Plaintiffs may, on or after the Objection Deadline, present the Motion to the Bankruptcy Court for approval; and (c) the Bankruptcy Court may enter the Order attached to the Motion with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE THAT objecting parties are required to attend any hearing with respect to the Motion, and the failure to appear at any such hearing may result in the Motion being granted and the annexed Order being entered upon default.

Dated: August 11, 2017
New York, New York

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ JAMES C. TECCE
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Attorneys for Adversary Proceeding Plaintiffs